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June 1, 2020

BY ECF

Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Jesus Marquez v. City of New York, et al.
20-CV-00755 (AJN)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney assigned to represent defendants City of New York and Sergeant Ricardo Montilla ("City Defendants") in the above-referenced matter. City Defendants write to respectfully request an additional thirty (30) day stay of this litigation.¹ The undersigned contacted plaintiff's counsel in order to obtain his consent to this request, but was unable to reach him. This is City Defendants' second request for such a stay.

As the Court is aware from defendants' previous application, in accordance with the "New York State on Pause" Executive Order signed by Governor Cuomo, the New York City Law Department, along with the majority of employers in New York City, have significantly transitioned its workforce to work from home status – hampering this office's ability to obtain the documentation necessary to fulfill its obligations pursuant to Fed. R. Civ. P. 11. Furthermore, the New York City Police Department is currently focusing its resources on responding to the ongoing protests and COVID-19 pandemic, and accordingly, is not in a position to respond to requests for documents and its members are unavailable for interviews, including representation interviews, at this juncture.

¹ Plaintiff also names New York City Police Department officers Kirk Bishop, Matthew Ferguson, and Juan Collado as defendants. According to plaintiff's counsel, defendants Collado and Ferguson were served with process on March 14, 2020. It is unclear whether individually named defendant Bishop has been served with process. Further, this office has made no decisions regarding the representation of these named defendants. Nevertheless, to the extent that any such individuals have been properly served, this office respectfully requests that the court *sua sponte* stay their responses to the complaint.

As such, City Defendants respectfully request an additional (30) day stay of this matter. Thank you for your consideration herein.

Respectfully submitted,

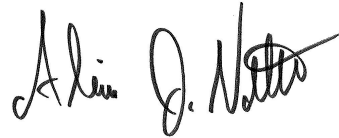
Laura Iheanachor /s/

Laura Iheanachor
Assistant Corporation Counsel

cc: By ECF
Craig William Trainor, Esq.
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Brooklyn, NY 10004
Attorney for Plaintiff

The Court hereby adjourns all deadlines in this matter, including those for the non-appearing Defendants, for an additional 30 days.
SO ORDERED.

SO ORDERED. 6/3/20

A handwritten signature in black ink, appearing to read "Alison J. Nathan", is written over a rectangular box.

Alison J. Nathan, U.S.D.J.